

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

<p>TIMOTHY BOZUNG, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>CHRISTIANBOOK, LLC f/k/a CHRISTIAN BOOK DISTRIBUTORS CATALOG, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 1:22-cv-00304-HYJ-RSK</p> <p>Honorable Hala Y. Jarbou</p> <p>JURY TRIAL DEMANDED</p>
---	---

**BRIEF IN SUPPORT OF PLAINTIFF’S MOTION TO SEAL CERTAIN
PORTIONS OF PLAINTIFF’S PROPOSED REPLY BRIEF AND THE
EXHIBIT ATTACHED THERETO (IN SUPPORT OF PLAINTIFF’S
MOTION FOR RELIEF FROM JUDGMENT PURSUANT TO FED. R. CIV.
P. 59(e) & FED. R. CIV. P. 60(b) AND FOR LEAVE TO FILE SECOND
AMENDED COMPLAINT PURSUANT TO FED. R. CIV. P. 15(a))**

STATEMENT OF ISSUE PRESENTED

Whether Plaintiff may file under seal certain references and documents in Plaintiff's proposed Reply in support of Plaintiff's Motion for Relief From Judgment Pursuant to Fed. R. Civ. P. 59(e) & Fed. R. Civ. P. 60(b) and for Leave to File Second Amended Complaint Pursuant to Fed. R. Civ. P. 15(a) pending a ruling by the Court on the continued sealing of those references to the Confidential Documents?

Plaintiff answers: Yes.

CONTROLLING OR MOST APPROPRIATE AUTHORITIES

- W.D. Mich. LCivR 10.6

For the reasons explained in the above Motion, Plaintiff respectfully seeks to file under seal certain references and documents in Plaintiff's proposed Reply in support of Plaintiff's Motion for Relief From Judgment Pursuant to Fed. R. Civ. P. 59(e) & Fed. R. Civ. P. 60(b) and for Leave to File Second Amended Complaint Pursuant to Fed. R. Civ. P. 15(a) and attached exhibit thereto.

Dated: May 4, 2023

Respectfully submitted,

/s/ E. Powell Miller

E. Powell Miller (P39487)

THE MILLER LAW FIRM, P.C.

950 W. University Drive, Suite 300

Rochester, MI 48307

Tel: 248-841-2200

epm@millerlawpc.com

Joseph I. Marchese

Philip L. Fraietta (P85228)

BURSOR & FISHER, P.A.

888 Seventh Avenue

New York, New York 10019

Tel: 646.837.7150

jmarchese@bursor.com

pfraietta@bursor.com

Frank S. Hedin

Arun G. Ravindran

HEDIN HALL LLP

1395 Brickell Avenue, Suite 1140

Miami, Florida 33131

Tel: 305.357.2107

fhedin@hedinhall.com

aravindran@hedinhall.com

Counsel for Plaintiff and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2023, I electronically filed the foregoing documents using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ E. Powell Miller

E. Powell Miller (P39487)

THE MILLER LAW FIRM, P.C.

950 W. University Dr., Ste. 300

Rochester, MI 48307

Tel: (248) 841-2200

epm@millerlawpc.com